

1 JOHN P. NOLLETTE
2 Attorney at Law
3 1403 W. BROADWAY AVE.
4 SPOKANE, WA 99201
5 (509) 701-0566

6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA,) FILED UNDER SEAL
9)
10 Plaintiff,) No. CR-09-00172-1
11) SUPPLEMENT TO THE
12 v.) SENTENCING
13 CLINTON L. HALBERT,) MEMORANDUM
14)
15 Defendant.)

16 TO: CLERK OF THE COURT, AND

17 TO: THE UNITED STATES OF AMERICA and THOMAS HANLON,
18 Assistant United States Attorney.

19 Defendant, Clinton Halbert, through counsel, John P. Nollette,
20 submits the following letters for the Court's review in sentencing.

21
22 Respectfully submitted this 14th day of January, 2011.
23

24 s/John P. Nollette

25 John P. Nollette, WSBA # 5474

26 Attorney for Defendant Clinton Halbert

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of January, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following, and/or I hereby certify that I have mailed by United States postal Service the document to the following non-CM-ECF participants:

Thomas J. Hanlon
Assistant United States Attorney
402 E. Yakima Ave., Suite 210
Yakima, WA 98901-2760

Frank Cikutovich
Attorney at Law
1403 W. Broadway Ave.
Spokane, WA 99201

s/John P. Nollette
JOHN P. NOLLETTE, WSBA #5474
Attorney for Defendant Clinton Halbert

Law Office of John P. Nollette
1403 W. Broadway Ave.
Spokane, WA 99201
Ph: (509) 701-0566
Fax: (509) 324-9029

To Whom it may Concern
My name is Alexander Bishop and
I am a Senior in Classical Composition
at Cornish College of the Arts in Seattle.
I am writing this letter in support
of my Grandfather Clint Lee Halbert.

My Grandfather has been an extremely
Positive influence on my time in College.
He and Renee Deik have always pushed
me to work hard, and to stay focused.
I need their love and support, as much as
they need mine, and each others.
Clint is an Important and Vital part
of our family, and it would tear the
family apart to have him taken away
from Renee and us.
Renee has changed Clint for the better,
and brought him closer to his loved
ones and god, and Clint has taken
extremely good care of Renee in spite
of her medical conditions.
Thank you for considering my words.

Alexander Bishop



November 28th, 2010

November 28, 2010

To Whom it May Concern:

Clint Halbert recently contacted me with a request for a letter clarifying his past relationship with the Love Israel Family. I have known Clint since our high school years in the early 1960's.

The following statement is based on my sincere effort to accurately explain his past involvement with the Love Israel Family:

Clint met Paul Erdman, soon-to-be-leader of the Love Israel Family sometime in mid 1968 and became enamored with Erdman's charisma and dynamic teachings. Clint's infatuation with Erdman along with Erdman's fervent encouragement resulted in Clint and his wife and child moving into Paul Erdman's house in Seattle. They moved in in the Fall of 1968, around the same time as I. Soon after that Paul Erdman changed his name to Love Israel.

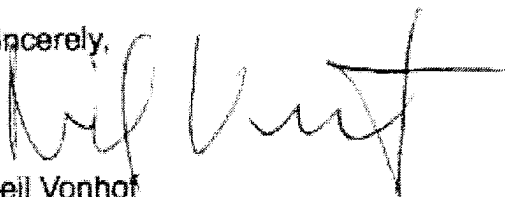
Clint did not adjust well to the life there, his admiration of Erdman wore thin and after some months he departed, His wife chose not to leave and remained with their son.

From that time on Clint was an occasional visitor, mostly for the purpose of seeing his child and ex-wife. He never again lived with the group and never became an actual member.

My impression of Clint's relationship with the Love Family and Love Israel was that that of someone who became only more and more distant from the group as the years have passed, as have most of the early participants, including myself.

Over the years I have had occasional contact with Clint and even though we rarely see each other, we've remained friends. I know him to be a kind and good person. It is my hope this letter will help to clarify what seems to be a misunderstanding regarding his history with the Love Israel Family.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil Vonhof', with a stylized, sweeping flourish extending to the right.

Neil Vonhof
1209 W. Kuiaha Road
Haiku, HI 96708

Brian Allen
2893 NW Luray Terrace
Portland, OR 97210

November 28, 2010

Re: Clint Halbert

To whom It May Concern:

I am writing at the request of Clint Halbert in regards to his association with the "Love Israel Family" as it may influence his upcoming sentencing hearing. I have not had personal contact with Clint Halbert in over 25 years, but I can speak regarding his connection to the "Love Family" community during the years I was living in that community.

I was a member of the Church of Armageddon, commonly known as, "The Love Israel Family" or as "The Love Family", based in Seattle, Washington from the summer of 1971 until spring of 1983. The group was originally a loose knit commune, which became an organized religion and collective community led by a man named Paul Erdman who called himself Love Israel.

During the time I was with the group Clint Halbert was an occasional visitor, but was not a member of the community. I understand that he had briefly stayed with the group prior to my arrival. He elected to not become a member of the community, but his wife at the time and his son did stay with the community.

The group was a true collective. Members gave all of their personal possessions to the community upon joining. During the time I was with the group, Clint Halbert maintained his financial and personal independence and was not a "member" of the community.

Clint was considered a "friend" of the community whose primary connection to the community was because his son and ex-wife were members of the community. He was also personal friends with a number of the members of the community.

In 1983 the vast majority of the members left the "Love Israel Family". A small group remained together for a few years and then disbanded after losing most of their collective assets to bankruptcy and foreclosure.

Sincerely,

Brian Allen

To Whom it May Concern,

I have known Clint Halbert for approximately 15 years, first meeting him when we was developing his property at China Bend on the Columbia River. At the time he was caring for his mother and they were back and forth between their home on the coast of Washington and China Bend, working on the land and buildings. I was hired by Clint to perform construction duties on his shop, the same shop he has since turned into a living quarters for himself and his wife Renee. As I lived close by we became good friends and I have had the pleasure of knowing him and his family for many years. I have always known him to be a honest, considerate, and forthright in all his dealings with his family, friends, neighbors, and the community.

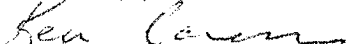
We talked often of his past with the Love Family and the affect it had on him and his family. Although he remains neighbors and friends with some of the past members he has expressed to me many times, how glad he was that it was all behind him and that he had moved on independently. He has since, through good times and bad, made a fine life and nice home for himself and his wife.

Clint is a caring and generous person, as shown by his care for his mother and now his wife Renee, with her medical conditions. I have always held him in high regard as an model of this type of person. I believe his presence would be sorely missed and undue, and unjust difficulty would arise for his family if he was to be incarcerated for his legal transgressions.

Although I moved away many years ago, we have corresponded from time to time and I count myself fortunate to have him as a friend.

Sincerely,

Ken Cameron


11/28/2010

November 25, 2010

To Whom It May Concern:

My name is Elizabeth Halbert and I am Clinton Lee Halbert's youngest daughter. I am 29 years of age, currently enrolled in the Masters Program of Education in Counseling at Heritage University, am a CASA/GAL volunteer for the Juvenile Justice Center in Yakima, WA, and have a seven-year-old son whom I adore. I am writing this letter in order to help define my father's character. I know my father very well as we see each other often, despite the geographical distance between us. Clint is a very big part of my and my son's life and I can honestly say that I could not have made the accomplishments that I have made without his support. He has consistently showed support in my life as a father, friend, and loving grandfather to my son. He is truly a thoughtful, caring, and generous individual that anyone would be proud to have in their lives.

My father has worked hard throughout his life and has always been involved in the lives of those around him. He offers any help he can to his neighbors and the community. He rushes to wildfires as a volunteer, makes sure the neighbors' driveways are clear of snow in the winter, and insists on hosting my son at his house for vacations to spend quality time with him and to free my time when I'm busy. He is a caring person and shows this in so many ways without expecting anything in return. Any involvement in the "Love Family" was terminated before I can even remember and my father has always strived to be hardworking, honest, and true to himself and others.

When my father met Renee Delk, I saw that he became complete. She has offered him the type of companionship and friendship that he deserves and he has done the same while spending every moment caring for her, as she is terminally ill and needs constant care. He is attentive and selfless in his relationship with Renee, who needs him to survive. They are a couple who value family, as their grandchildren mean the world to them. Since she moved in with my father, their house has become a home; a home that they want their grandchildren to enjoy throughout their lives as well.

My main point in this letter is to confirm that my father, Clint Halbert, is a wonderful person and deserves to be treated fairly. I can attest that he is undoubtedly Christian in his faith, has no intention to harm anyone, and would give a stranger the shirt off his back if needed. My opinion is, of course, biased, as I am his daughter, but every word in this letter is the truth and should be considered as evidence of his good-natured character.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Halbert". The signature is written in dark ink and is positioned above the printed name.

Elizabeth Halbert

November 26, 2010

To Whom It May Concern:

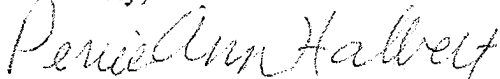
My name is PerrieAnn Halbert. Clint Halbert and I were together for 21 years. I met Clint Halbert in 1970. He was separated from his wife, who had left him and taken their son to move in with Paul Erdman (AKA Love Israel). Naturally, there was a connection between Clint and the "Love Family" because of his son and ex-wife. Because he didn't share the views of the group, we were rarely there and had our own place, raising our three children. 1981 was the last occasion that we visited there, nearly 30 years ago. That was 30 years ago.

After we divorced, Clint became care-giver to his mother, Vivian Halbert, and they purchased property that he had always loved at Kettle Falls, Washington, where he moved with his mother. When he remarried, his wife had serious health problems, and he became her care-giver. There is no connection with Clint and the Love Family other than the fact that they also own property in the area.

Clint is a good man and has been a good father. He has high morals, good standards, is a good citizen, and believes in God and Jesus Christ.

I have known Clint for most of my life and am a witness to his character.

Sincerely,

A handwritten signature in cursive script that reads "PerrieAnn Halbert". The ink is dark and the handwriting is fluid.

PerrieAnn Halbert

November 25, 2010

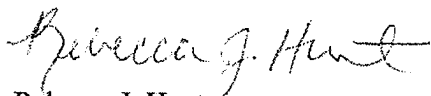
To Whom It May Concern:

My name is Rebecca Hunt. I am Clinton Halbert's oldest daughter, a Registered Nurse, a wife, and mother of three beautiful children. I am writing this letter on Clint's behalf in hopes that it will shed some light on the character of this man and give an honest and heartfelt truth as to who he is and has been as a father, friend, and contributing member of the community in which he lives. Clint was an attentive and caring father and he always worked hard to make sure that his family was taken care of even in the toughest of times. He has been a friend and guide as well, and has consistently been there for me when I needed advice, encouragement, or just a shoulder to lean on. He has helped me to become the woman I am through his love, dedication and insight. Clint has many friends that will agree and attest to his hard working, generous, and benevolent character. Clint has always striven to be an active and beneficial part of the community; helping out however he was able and whenever there was a need. I have known Clint all of my life. I have never known him to engage in anything illegal or negligent, but instead have seen him striving to improve upon himself, in his relationships, and in his faith.

Clint found a love for the property up in China Bend many years ago after first experiencing the beauty of the land as a young man. After his first experience with China Bend, it was always his wish to build a home there for his family to enjoy. My grandmother, Vivian Halbert, helped him to realize this dream and lived with him there for some time, as he was her devoted son and full-time caregiver, until she finally passed away. Clint met Renee and they fell in love and made the commitment to devote their lives to one another and to make it their home. Clint took on the role as husband, friend, and full-time caregiver for Renee as her health conditions were significant and disabling in many ways. Clint has not been affiliated with the Love Family in any way during this time other than to be a neighbor, as it is a fact that they own property in close proximity. As a child growing up I recall that we were in and out of the Love Family, more out than in, as a direct result of Clint's opposing opinions, views and ideals. Neither Clint nor anyone else in our family has been involved with the Love Family since 1981, the year my youngest sister was born.

I pray that you will use your hearts and minds to look further into the truth and the facts of this case and realize that Clint is not a bad man. He is not a threat to our society or a breaker of laws or rules. He is not perfect, no one is, but striving to live honestly and abidingly. Clint is the sole support for Renee and has committed himself to her care. He is guilty of doing everything in his power to enhance her quality of life as she is truly a very sick woman. I humbly ask for your consideration and re-evaluation of Clint's character and that you are merciful in your judgment.

Sincerely,


Rebecca J. Hunt

November 26, 2010

Your Honor,

I am writing on behalf of my friend Clint Halbert. I've known Clint since we were kids in junior high school. We were friends through high school, and Clint was even in my wedding. After I got married in 1964 Clint's life and my life took a decidedly different course. I worked for a year or so at the mill in Shelton, then went into the service station business, which evolved into the automotive machine shop business, which was my career for most of my adult life, until I retired a few years ago. Clint got to go to college in Seattle, which is where he met the person who became Love Israel after which his life took a decidedly different turn. My wife and I kept in touch with Clint while he was in the Love Family and in the early 80's when the Love Family broke up and he was no longer involved. During that time we were always buds, but not once did Clint try to influence me as far as his lifestyle was concerned. Infact, we basically didn't discuss his life style; just cordial visits discussing our families. No discussion on religious matters, more just a good visit because we were friends.

At a certain point in Clint's life he was going through some rough times and came to live with us in Olympia and even worked for a short time in my machine shop before he moved on to become a caretaker for his elderly mother. I'll tell you this that all the time I've talked to Clint on the phone and his mother (she was a dear friend and even made my mother's wedding dress), I've never seen the side of Clint that is some kind of a raging out-of-control drug person that I could image in my wildest dreams would deserve to go to prison for his misdeeds. Having said that, I realize Clint has been convicted in a court of law of conduct that is against federal law. However, I also know that Clint had to quit working for me in the early 90's because he had a lot of back issues and pain associated with a bad back. I also know the background of his wife Rene, and I know that they both had medical marijuana permits. Please understand, I have never used marijuana and wouldn't use it if it was legal, but it's certainly a social issue that we have mixed feelings about. As a business owner I employed dozens of younger fellas over the years. I had employees that were functional alcoholics as well as the occasional party binger type of alcoholic. I've also had fellas that made no bones about the fact that they smoked a little weed, and I can tell you that the problems that I have personally had experiences with which include a fella being led off to prison for one too many DUI's as well as a fella that would get drunk on the weekend and would occasionally miss the first two days of the work week because of "illness." I personally believe that pot smokers present less of a threat to society than alcohol abusers. It's only been a couple of weeks since CNN declared alcohol to be the most dangerous drug in our society. With marijuana legalization being on the ballot in California and other states, it just seems like there is such a mixed message going out about marijuana and its use. I personally hate drug use and think it's a curse on our society. In a perfect world I wish alcohol and marijuana wouldn't be used and abused.

I don't see a guy who's 65 years old taking care of his infirmed wife and having been using some marijuana that they were permitted to use, living out in the middle of

nowhere, as being that great of a threat to our society. I don't know if you know the background of Clint's wife Rene's medical problems, Through no fault of her own, a medical mistake led to over 40 operations. She lives with ongoing constant pain and relies on Clint for daily help. I know Clint loves her and is totally devoted to helping her. It seems like a travesty of justice to take that help that she needs and deserves away from her.

When I was in high school I got caught talking in class and I had to write on the blackboard 500 times, "Freedom is not the lack of justice, but the proper use of justice." This is the first time in my adult life that I have known somebody that this applies to. The toll that this process has taken on Clint's life is far more than many people have to pay for crimes far more serious than Clint has been found guilty of. I do not believe that justice is served by taking Clint away from caring for his wife or for that matter taking his property away that was not purchased with ill-gotten drug money, but by money given him by his mother as his inheritance. In a society that all too often sees celebrities, politicians and the wealthy let off because they can afford the best representation, it would be nice to see that someone like Clint Halbert has the proper use of justice applied in his case. I pray you'll have mercy on Clint Halbert and not give him prison time.

Sincerely,

George Johnson

11/28/2010

To Whom It May Concern,

My wife and I are writing this letter to give you a deeper understanding of a man you are now judging. We first met Clint approximately 15 years ago. We were looking for land in NE Washington to build a vacation cabin. In 1998, we settled on a parcel adjacent to his property. At that time, he was the sole caretaker for his dear elderly mother. Prior to her health deteriorating, she was a very vigorous, independent, strong pioneer-type woman with a great capacity for life. It's important to tell some of her story to illustrate the depth of Clint's experience and character. She was definitely a "straight-shooter", and in my opinion a very capable judge of what was in her best interest. Of her 4 children, Vivian chose Clint to be her sole care-giver, guardian and executor. Above all, she appreciated and treasured his love and compassion for her. It was beautiful to see them together; no one could wish for a more loving son. We knew then that this man was very special, subsequent experiences validated that initial judgment.

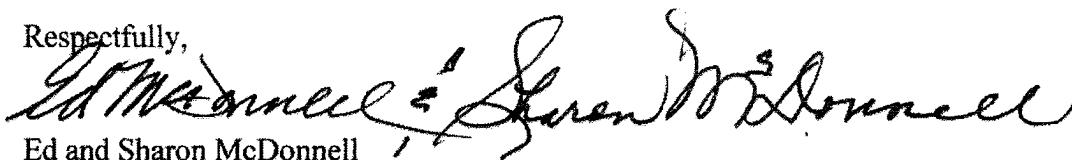
Our cabin was completed in 1999 and it became our 2nd home. We are there every year for a month or two. Our relationship with Clint advanced very quickly due in large part to the humanity and goodness of the man. We know him well and consider him a dear and trusted friend. He is a gentleman: courteous, respectful and with a deep faith in God and his fellow man. On numerous occasions, he dropped whatever he was doing to help us during the process of getting our cabin built, well and power installed, trees planted, truck repaired. It's a long list of kindnesses and I'm just one of many in our community who continues to benefit from his extraordinary unselfishness.

In our remote location, great distance separates us from critical fire department services. This situation leaves us very vulnerable. Clint saw the need and sprung into action to provide support when practically speaking there was none. He found an old Fire Engine, re-built it, maintains it, went through training and stands at the ready to be the first responder if any of our properties are threatened by regional wildfires or lightning. In typical Clint fashion, he took on the project without asking for help from anyone.

After Renee came into his life, once again he became a caretaker for a loved one with very complex and debilitating medical problems. I know he has traveled back and forth across Washington, Oregon and regionally in a tireless pursuit of the very best treatment for her. He is her unrelenting and tireless advocate. Anyone who has been a caretaker understands the quality of life issues and the serious commitment it takes to support someone in her circumstances. I've never heard him complain about or question the personal sacrifices associated with her care. His love and commitment is inspirational to both of us.

He is a self-reliant man with an array of formidable practical skills and spiritual insights. He puts his heart, his strength, his Faith, his generosity of spirit into everything he does. His love and kindness makes life sweeter for his family, his friends, neighbors and all of us fortunate to be in his life. If the measure of a man is his willingness to lend a hand, he is a really good man. He is certainly not a criminal type that Society needs protection from by incarceration. Quite the contrary, if he made a mistake in judgment, based on all of the things he's done so well and so right, for so long, it shouldn't be difficult to show him leniency and Mercy.

Respectfully,

The block contains two handwritten signatures in black ink. The first signature is 'Ed McDonnell' and the second is 'Sharon McDonnell'. They are written in a cursive, flowing style.

Ed and Sharon McDonnell
2400 Llewellyn Dr.
Las Vegas, NV 89102 702/335-3997

Clint Halbert

From: "Eric Johannsen" <ericonsantiago@gmail.com>
To: "Clint Halbert" <clinthalbert@gmail.com>
Sent: Friday, November 26, 2010 3:02 PM
Subject: Re: email letter
To whom it may concern,



I am Eric Johannsen, director and producer of the documentary "It Takes a Cult". It has come to my attention that my documentary and, more specifically, the comments therein of Clint Halbert are being used to influence the court with incomplete information taken out of context.

Because of time constraints and the very nature of the documentary form, I was not able to provide the audience with a complete portrait of every person who appeared in the film.

A review of the full interview, recorded in the summer of 2003, will prove to the court that Clint Halbert had separated himself from the Love Family decades ago. I can provide the uncut footage on Tuesday at the earliest.

Respectfully,
Eric Johannsen

On Nov 24, 2010, at 5:51 PM, Clint Halbert wrote:

Eric, I haven't gotten a reply from my atty. yet but a letter from you saying who you are and that the edited version of your Love Family video "It Takes a Cult" left out my comments separating me from the family and portraided a picture that was incomplete and misleading to the court and that you can provide uncut footage on Tues at the earliest.----please keep me informed---thank you---clint

To Whom it may concern,

I have known Clint Halbert since 1974. He worked for me welding cattle guards. I know him as an honest and trustworthy person. From the time I have known him he was in conflict with the Love family and them with him. Love Israel had taken his wife and child.

I was at his sixtieth birthday party when Love invaded his party. To think Clint is part of the Love Family you are totally wrong.

Monte Alexander
305 Mary Ann Creek
Oroville, Washington 98844

Monte Alexander
305 Mary Ann Cr. Rd.
Oroville Wash 98844

509 485 2602

December 3, 2010

To whom it may concern:

My name is Bill Lierly, I've been clean and sober since April of 1985. Clint Halbert asked me to be his sponsor in AA and NA last Spring. We have two meetings a week in Northport that Clint attends as often as possible. He calls me regularly to talk about life issues and the steps of the program.

Clint is a full time caregiver for his wife Renee'. Still, with all that going on, I see Clint growing and changing. He is getting more involved with the fellowship, and more a part of community. I see Clint as a great value to our fellowship and town. He shows concern for others and tries to be helpful.

Please feel free to contact me if you have any questions.

A handwritten signature in cursive script that reads "W.W. Lierly". The signature is written in dark ink and is positioned above a horizontal line.

Bill Lierly (509) 675-2462